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UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

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United States of America,

Plaintiff,

vs.

SEAN FINN,

Defendant.

2:13-cr-00439-LDG-VCF-4

STIPULATION FOR PROTECTIVE ORDER

IT IS HEREBY STIPULATED AND AGREED between the government, by and through its undersigned attorneys, and Dustin Marcello, counsel for defendant Sean Finn, that this Court issue an Order protecting from disclosure to the public any discovery documents containing personal identifying information. Such documents hereinafter shall be referred to as "Protected Documents." The parties state as follows:

1. Protected Documents that will be used by the government in its case-in-chief include personal identifiers, including social-security numbers, driver's license numbers, dates of birth, bank-account numbers, bank records, and addresses of participants, witnesses, and victims in this case.

2. Discovery in this case is voluminous and includes more than 45 gigabytes of electronically stored information. Many of these documents include personal identifiers. Redacting the personal identifiers of all participants, witnesses, and victims in such documents would prevent the timely disclosure of discovery to defendant.

3. The government therefore agrees to provide Protected Documents without redacting all of the personal identifiers of such participants, witnesses, and victims.

4. Access to Protected Documents will be restricted to persons authorized by the Court, namely, defendant, his attorneys of record, and the paralegals, investigators, experts, and secretaries employed by the attorneys of record.

5. The following restrictions will be placed upon defendant, defendant's attorneys, and the above-designated individuals performing on behalf of defendant unless and until further ordered by the Court. These persons shall not:

a. make copies of Protected Documents for, or allow copies of such documents to be made by, any other person;

b. allow any other person to read Protected Documents; and

c. use Protected Documents for any purpose other than preparing to defend against the charges in the Indictment or any Superseding Indictment arising out of this case.

6. Defendant's attorneys shall inform any person to whom disclosure may be made pursuant to this Order of the existence and terms of this Court's Order.

7. The requested restrictions shall not restrict the use or introduction as evidence of discovery documents containing personal-identifying information such as social-security numbers, driver's license numbers, dates of birth, and addresses of participants, witnesses, and victims in this case during the trial of this matter.

8. Upon conclusion of this action, defendant's attorneys shall return to government counsel, or destroy and certify to government counsel the destruction of, all discovery documents containing personal-identifying information such as social-security numbers, driver's license numbers, dates of birth, and addresses, within a reasonable time, not to exceed 30 days after the last appeal or habeas petition is final.

NICHOLAS TRUTANICH  
United States Attorney

/s/ Anna Kaminska  
ANNA G. KAMINSKA  
BLAKE C. GOEBEL  
Trial Attorneys  
U.S. Department of Justice

1/9/2019  
DATE

/s/ Dustin Marcello  
DUSTIN R. MARCELLO  
Counsel for defendant Sean Finn

1/9/2019  
DATE

ORDER

IT IS SO ORDERED this 11th day of January, 2019

  
UNITED STATES MAGISTRATE JUDGE

